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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHRISTI T. MORRELL,

Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 2:19-cv-00765-JCM-BNW

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and Remand (Dkt. No. 15, filed on March 23, 2020), currently due on April 22, 2020, by 30 days, through and including May 22, 2020. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 11) be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload as described below. Since Plaintiff's motion was filed on March 23, 2020, Defendant's counsel has worked on approximately 18 district court cases, as well as a Ninth Circuit appeal. Counsel is also responsible for other substantive non-litigation matters in the

1 Office of General Counsel. The Office of General Counsel also currently has a number of attorneys
2 out on leave of absence, in addition to staff attrition, which has increased the undersigned's workload
3 at a time when the office is under a hiring freeze.

4 Additional time is required to review the record, to evaluate the numerous issues raised in
5 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's
6 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as
7 possible. This request is made in good faith and with no intention to unduly delay the proceedings,
8 and counsel apologizes for any inconvenience.

9 On April 14, 2020, counsel for Defendant conferred with Plaintiff's counsel, who has no
10 opposition to this motion.

11 It is therefore respectfully requested that Defendant be granted an extension of time to respond
12 to Plaintiff's Motion for Reversal and Remand, through and including May 22, 2020.

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14 Dated: April 14, 2020

Respectfully submitted,

15 NICHOLAS A. TRUTANICH
16 United States Attorney

17 /s/ Allison J. Cheung
18 ALLISON J. CHEUNG
19 Special Assistant United States Attorney

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21 IT IS SO ORDERED:

22 
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: April 16, 2020.
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